

GCP-4

VI.4. (P. 13) **Equipment Installation and Maintenance** – “All equipment shall be ... operated in such a manner that... the emissions do not exceed those listed in Siting Registration Application, [and] all control efficiencies are met.

VII. 5 (P.16) **Specification of Allowable Equipment – Flares** – “All routine, non-emergency flares shall be operated with no visible emissions.”

VIII. 5 (P. 21) **Monitoring, Recordkeeping, Reporting ... Requirements – Flares** – “Verify weekly that all routine ... flares are operating with no visible emissions (determined using EPA Method 22), and that the continuous ignition source is functioning properly.”

VIII. 9 (P. 22) **Monitoring, Recordkeeping, Reporting ... Requirements – Storage Tanks** – “At each Facility for which the annual throughput is greater than 2,000 bbl/yr, maintain records of monthly throughput for each crude oil and condensate storage tank.”

VIII. 10 (P. 22) **Monitoring, Recordkeeping, Reporting ... Requirements – VRUs** – “Once per month, inspect units and verify that equipment is working properly.”

XI. 3 (P. 27) **Revocation of Registration** – “The Department may revoke a Registration under GCP-4 in writing if the owner or operator of the Facility has knowingly and willfully misrepresented a fact on a registration form.”

GCP-O&G

A201.A (P. 12) **Gas Analysis Requirements** – “Sites with the following equipment shall perform an annual gas analysis to include H2S concentration: Flares, Vents, Enclosed Combustion Devices, Thermal Oxidizers;”

A205.B (P. 21) **Control Device Options, Requirements, and Inspections for Tanks** – “compliance with the allowable emission limits in the Registration Form shall be demonstrated by operating the control device and/or vapor recovery units as a closed vent system that captures and routes all emissions from tanks back to the process stream or to the control device, and does not vent to the atmosphere”

At least once per month, the permittee shall inspect the piping from the tanks to vapor recovery unit or control device for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatches, access covers, caps, or other closure devices. In the event that a leak or defect is detected, the permittee shall repair the leak or defect within 30 calendar days and in a manner that minimizes VOC and HAP emissions to the atmosphere.

Alternatively to the above, and if selected in the Registration Form, the Permittee may implement a program that meets the requirements of NSPS OOOOa (40 CFR 60.5416a).

A207.B (P. 24) **Pilot Flame, Visible Emissions, and Operational Requirements** – “For flares with a continuous pilot or an auto igniter, the permittee shall continuously monitor the presence of a flare pilot flame using a thermocouple equipped with a continuous recorder and alarm, to detect the presence of a flame, or any other equivalent device approved by the Department.”

“When any visible emissions are observed, the permittee shall perform a Method 22 observation while the flare pilot flame is present to certify compliance with the visible emission requirements. The observation shall be a minimum of fifteen minutes.”

A211.B (P. 30) **40 CFR 60, Subpart OOOO and/or OOOOa**– “For units subject to 40 CFR 60, Subpart OOOO and/or OOOOa, the permittee shall comply with all applicable requirements in Subpart A and Subpart OOOO and/or OOOOa.”

NOIs -----

“The issuance of an NOI does not constitute a determination of regulatory applicability, regardless of statements of anticipated applicability made in the application. It is the permittee’s responsibility to determine applicability and to comply with all applicable regulations.”

“Any changes in the method of operation or addition of more units at the site may constitute a modification, which requires the Department’s prior approval for construction and/or operation.”